

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
MACON DIVISION

LISA TOWNS,	:	
THE DAUGHTER OF JAMES FOGGAN,	:	
DECEASED,	:	CIVIL ACTION NO. <u>5:13-CV-370-MTT</u>
	:	
Plaintiff	:	
	:	
VS.	:	C O M P L A I N T
	:	
LAKE CROSSING HEALTH CENTER,	:	
LLC, UNIVERSITY HEALTH, INC.,	:	
and UNIVERSITY PHYSICIANS	:	
ASSOCIATES, P.C.,	:	
	:	
Defendants	:	

LISA TOWNS, the daughter of JAMES FOGGAN, brings this action for her father's wrongful death, and respectfully shows:

1.

The Plaintiff is a resident of that State of Florida and hereby asserts this claim against the Defendants pursuant to 28 U.S.C. §1332.

2.

The Defendants UNIVERSITY HEALTH, INC. and UNIVERSITY PHYSICIANS ASSOCIATES, P.C. are domestic corporations who principal places of business in Richmond County, Georgia, and thus, are subject to the jurisdiction and venue of this Court.

3.

The Defendant LAKE CROSSING HEALTH CENTER, LLC is a domestic company who at all times relevant to this complaint for damages maintained a principal place of business

in Warren County, Georgia. The Defendant LAKE CROSSING HEALTH CENTER, LLC is subject to the jurisdiction and venue of this Court.

4.

LISA TOWNS, as the Daughter of JAMES FOGGAN, is entitled to bring this action under the authority of O.C.G.A. §51-4-2.

5.

On or about September 30, 2011, the Deceased JAMES FOGGAN, was under the care of the Defendants LAKE CROSSING HEALTH CENTER, LLC, UNIVERSITY HEALTH, INC., and UNIVERSITY PHYSICIANS ASSOCIATES, P.C.

6.

The Defendants LAKE CROSSING HEALTH CENTER, LLC, UNIVERSITY HEALTH, INC., and UNIVERSITY PHYSICIANS ASSOCIATES, P.C. were negligent in the aforementioned care of the deceased, JAMES FOGGAN, proximately and foreseeably causing his death.

7.

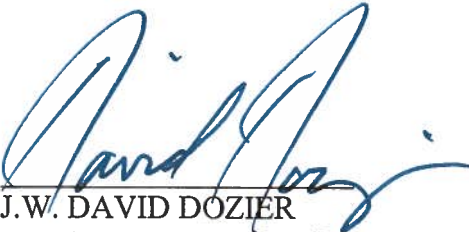
As a result of the Defendants' negligence, the Deceased, JAMES FOGGAN, passed away on or about September 30, 2011.

8.

Plaintiff LISA TOWNS is entitled to recover damages from the defendants for the full value of her father's life in an amount to exceed \$75,000.00.

WHEREFORE, plaintiff prays that she recover damages from the defendants for the full value of her father's life as determined by the enlightened conscience of a fair and impartial jury and that all costs of this action be assessed against the defendants.

This 26th Day Of September, 2013.



J.W. DAVID DOZIER  
ATTORNEY FOR PLAINTIFF  
GEORGIA BAR NO. 228898

Dozier Law Firm, LLC  
327 Third Street  
P. O. Box 13  
Macon, Georgia 31202-0013

PLEASE HAVE THE RICHMOND COUNTY SHERIFF SERVE THE DEFENDANT  
UNIVERSITY HEALTH, INC. AT:

UNIVERSITY HEALTH, INC.  
C/O EDWARD L. BURR  
1350 WALTON WAY  
AUGUSTA, GA 30901

PLEASE HAVE THE RICHMOND COUNTY SHERIFF SERVE THE DEFENDANT  
UNIVERSITY PHYSICIANS ASSOCIATES, P.C. AT:

UNIVERSITY PHYSICIANS ASSOCIATES, P.C.  
C/O TONYA BROWN  
10303 D'ANTIGNAC STREET, SUITE 1150  
AUGUSTA, GA 30901

PLEASE HAVE THE WARREN COUNTY SHERIFF SERVE THE DEFENDANT LAKE  
CROSSING HEALTH CENTER, LLC AT:

LAKE CROSSING HEALTH CENTER, LLC  
C/O AMY STEWART  
1478 MACON HIGHWAY  
WARRENTON, GA 30828